

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 99-10-2-JJF
	:	
RANGI KNIGHT,	:	
	:	
Defendant.	:	

DEFENDANT'S MOTION FOR  
RETROACTIVE COCAINE BASE SENTENCING REDUCTION

AND NOW comes the defendant, Rangi Knight, by his attorney Edson A. Bostic, Federal Public Defender, and pursuant to 18 U.S.C. § 3582(c)(2), files this Motion for Retroactive Cocaine Base Sentencing Reduction.

In support of this motion, Mr. Knight avers as follows:

1. By written report dated January 31, 2008, the United States Probation Office determined that defendant, Rangi Knight, qualifies for the two-level guideline reduction, and that application of the 2-level reduction produces a revised Guideline range of 120 to 150 months imprisonment.

2. On February 20, 2008, the Probation Office represented to defense counsel that the United States Attorney's Office would not oppose application of the two-level reduction and that the government requested a sentence in the mid-level of the revised guideline range.

3. With the agreement of the client, defense counsel waives an evidentiary hearing, concurs in the Probation Officer's written report, and requests that the District Court consider a sentence of 120-months imprisonment.

WHEREFORE, it is respectfully requested that Mr. Knight's Motion for Retroactive Cocaine Base Sentencing Reduction be GRANTED.

Respectfully submitted,

/s/\_\_\_\_\_

Edson A. Bostic  
Federal Public Defender

Attorney for Defendant Knight

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